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MEMO ENDORSED

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March 5, 2024

VIA ECF

The Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, 10007

The request is granted. Newmark shall respond to the amended complaint by March 25, 2024. The initial conference scheduled for March 13, 2024, is adjourned to March 28, 2024, at 11:00 a.m. The parties are reminded to dial 877-411-9748 and to enter access code 3029857# when prompted. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos", written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: March 7, 2024

New York, New York

Re: *Shannon Hayes v. G&E Real Estate Management Services d/b/a Newmark*
Case No. 24-cv-01459 (ER)

Dear Judge Ramos:

This firm has recently been retained to represent Defendant G&E Real Estate Management Services d/b/a Newmark ("Newmark") in the above matter that was transferred to this Court from the District Court for the District of Columbia on February 26, 2024 (Dkt. No. 20).

Provided herewith is a proposed stipulation and order of substitution of counsel, substituting Littler Mendelson, P.C. for Carr Maloney PC as counsel for Newmark now that the case has been transferred. This stipulation has been signed by Newmark, outgoing counsel, and incoming counsel, and we respectfully request that it be "so-ordered" by the Court.

Additionally, I write with the consent of Plaintiff's counsel to request a two-week extension of Newmark's time to answer, move against or otherwise respond to the Amended Complaint (Dkt. No. 13), until March 25, 2024. This is Newmark's first application for the relief requested herein, and it is made because my firm has just been retained and requires time to review this matter with our client. Plaintiff and her current counsel are also in the process of identifying New York counsel now that the case has been transferred. Accordingly, the parties respectfully request an adjournment of the March 13, 2024 initial conference to a date following the requested March 25, 2024 response deadline.

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Thank you in advance for your consideration of these requests.

Respectfully submitted,

Littler Mendelson, P.C.

/s/ Kelly C. Spina

Kelly C. Spina
Vernée C. Pelage

Attachment

cc: All counsel of record (via ECF)